

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA

EPSILON ENERGY USA,  
INC.,

Plaintiff,

v.

CHESAPEAKE APPALACHIA, LLC,

Defendant.

Civil Action No. [ ]

FILED  
HARRISBURG, PA

APR - 9 2021

PER TBN  
DEPUTY CLERK

**MOTION FOR LEAVE TO FILE PORTIONS OF COMPLAINT,**  
**MOTION FOR PRELIMINARY INJUNCTION, MEMORANDUM**  
**IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION,**  
**AND EXHIBIT UNDER SEAL**

Plaintiff Epsilon Energy USA, Inc. (“Epsilon”), by and through its undersigned counsel, respectfully moves this Court for leave to file portions of its Complaint, Motion for Preliminary Injunction, and Memorandum in Support of Motion for Preliminary Injunction (“Memorandum”) against Defendant Chesapeake Appalachia, LLC (“CHK”), along with the Settlement Agreement that is attached as an exhibit to the Complaint and Memorandum, under seal. In support of this motion, Epsilon refers the Court to its Memorandum in Support filed contemporaneously herewith.

WHEREFORE, for the reasons stated in the accompanying Memorandum in Support of Motion for Leave to File Portions of Complaint, Motion for Preliminary

Injunction, Memorandum in Support of Motion for Preliminary Injunction, and Exhibit Under Seal, Epsilon respectfully requests this Court enter an Order granting it leave to file certain portions of its Complaint, Motion for Preliminary Injunction, and Memorandum, as well as the Settlement Agreement (attached as an exhibit to the Complaint and Memorandum), under seal.

Dated: April 9, 2021

Respectfully submitted,

/s/ Gregory J. Krock

Gregory J. Krock  
Pa. I.D. No. 78308  
Elizabeth M. Thomas  
Pa. I.D. No. 322002

MCGUIREWOODS LLP  
Tower Two-Sixty  
260 Forbes Avenue, Suite 1800  
Pittsburgh, PA 15222-3142  
(412) 667-6000 (Telephone)  
(412) 667-6050 (Facsimile)  
[gkrock@mcguirewoods.com](mailto:gkrock@mcguirewoods.com)  
[ethomas@mcguirewoods.com](mailto:ethomas@mcguirewoods.com)

Jonathan T. Blank  
*Pro Hac Vice*  
MCGUIREWOODS LLP  
652 Peter Jefferson Parkway  
Suite 350  
Charlottesville, VA 22911  
(434) 977-2500 (Telephone)  
(434) 980-2222 (Facsimile)  
[jblank@mcguirewoods.com](mailto:jblank@mcguirewoods.com)

*Counsel for Plaintiff*  
*Epsilon Energy USA, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing  
**Motion for Leave to File Portions of Complaint, Motion for Preliminary  
Injunction, Memorandum in Support of Motion for Preliminary Injunction,  
and Exhibit Under Seal** has been served on served upon the following by mail, this  
9th day of April 2021:

Corporate Representative  
Chesapeake Appalachia, LLC  
c/o The Corporation Company  
1833 S. Morgan Road  
Oklahoma City, OK 73128

/s/ Gregory J. Krock